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July 17, 2000

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**RECEIVED**

JUL 17 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-82: Ex Parte Presentation

Dear Ms. Salas:

On March 14, 2000, Bell Atlantic Mobile (BAM) submitted an *ex parte* notice of a presentation which had been made to Commission staff the previous day. In that presentation BAM documented its need for additional radio spectrum to meet the growing customer demand for wireless services, particularly spectrum-intensive data services such as messaging and Internet access. BAM also documented its transition from analog to CDMA digital technology in the New York market, and showed that even with that transition, additional spectrum would be needed.

Although BAM's *ex parte* notice was filed in DA 00-318,<sup>1</sup> it is also relevant to the issues raised in the above-referenced rulemaking docket. Accordingly, as successor to Bell Atlantic Mobile, Verizon Wireless is resubmitting the notice to ensure that the notice is included in the above-referenced docket.

Very truly yours,



John T. Scott

Attachment

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<sup>1</sup> "Wireless Telecommunications Bureau Seeks Comment on AT&T Wireless Services, BellSouth Corporation and Bell Atlantic Mobile Petitions Regarding CMRS Spectrum Cap Limits," *Public Notice*, DA 00-318 (rel. Feb. 18, 2000).

No. of Copies rec'd 041  
List ABCDE

cc: The Honorable William Kennard  
The Honorable Harold Furchtgott-Roth  
The Honorable Susan Ness  
The Honorable Michael Powell  
The Honorable Gloria Tristani  
Christopher J. Wright  
Thomas Sugrue  
James D. Schlichting  
Kathleen O'Brien Ham  
Audrey Bashkin  
Paul Murray

**Donald C. Brittingham**  
Director - Wireless Matters  
Government Relations  
202-336-7873

March 14, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW  
Room: TW-A325  
Washington, DC 20554

**Re: DA 00-318; Petitions Seeking Relief of CMRS Spectrum Cap**

Dear Ms. Salas:

On March 13, 2000, Bill Stone from Bell Atlantic Mobile (BAM), John Scott from Crowell and Moring, and the undersigned met with Ari Fitzgerald of Chairman Kennard's office, Bryan Tramont of Commissioner Furchtgott-Roth's office, Mark Schneider of Commissioner Ness' office, and Adam Krinsky of Commissioner Tristani's office to discuss BAM's Petition for Limited Forbearance of the CMRS spectrum cap rule. BAM seeks limited forbearance of the spectrum cap rules as they apply to the upcoming reauction of PCS licenses. Such an action would not risk reconcentration of the CMRS market, since the subject licenses are not being used.

In addition to the issues outlined in the Petition, we discussed the impact that the current rule has on BAM's ability to deliver high-speed data and other services that are expected to be in demand over the next few years. A summary of this information is attached.

Please include a copy of this ex parte presentation in the record for the above captioned proceeding. If you have any questions, you may call me on (202) 336-7873.

Attachment

cc: A. Fitzgerald  
A. Krinsky  
M. Schneider  
B. Tramont

Meeting with FCC

# BAM Need for Spectrum Cap Relief

Bill Stone

Bell Atlantic Mobile

Executive Director - Network Planning

March 13th, 2000

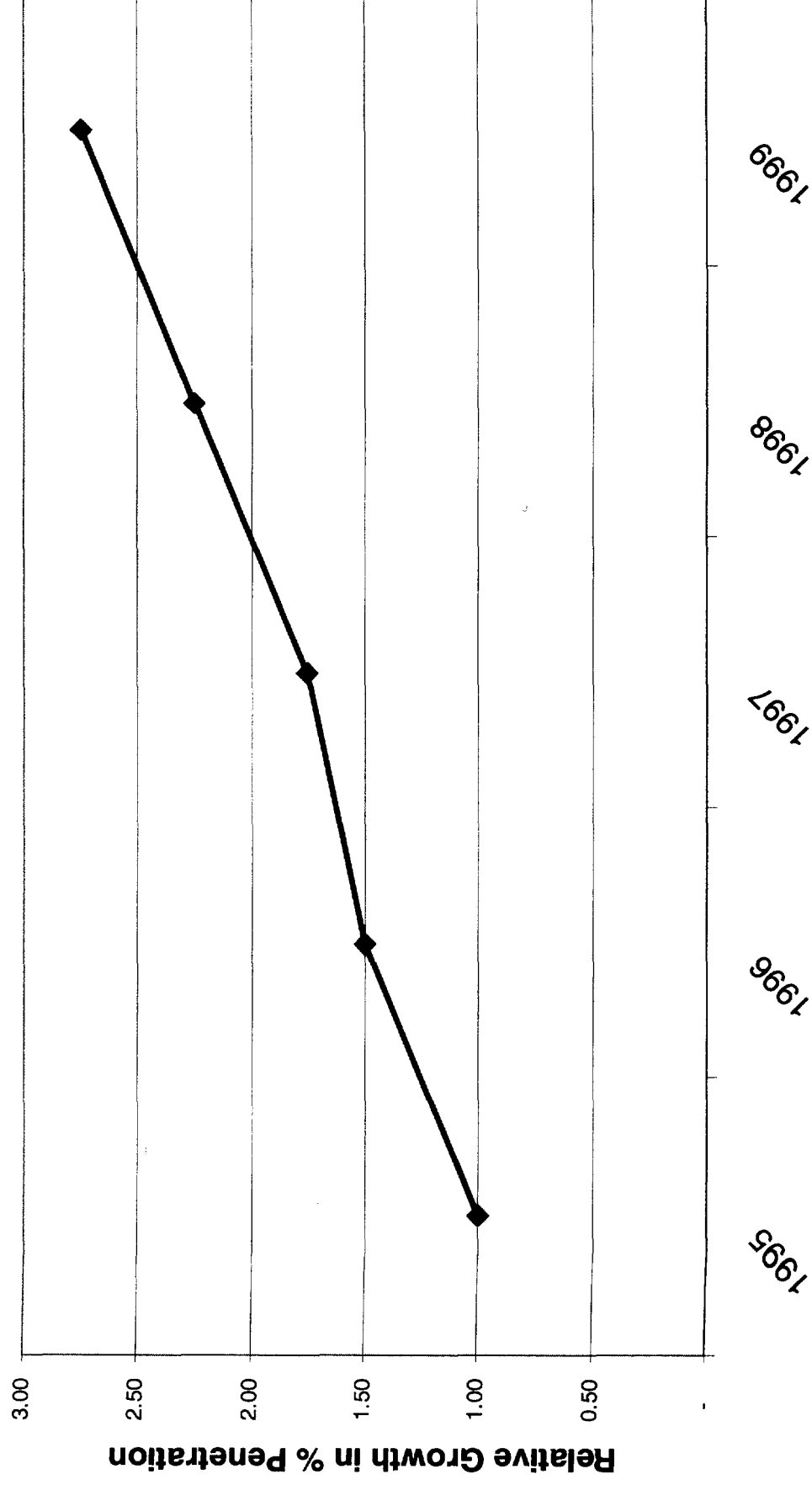
# New York Example

- Five Service Providers in Operation Today
  - Bell Atlantic Mobile, Sprint, AT&T, Omnipoint, and Nextel
- Service Offerings
  - CDMA Digital Service Launched in 1997
    - Primarily mobile voice
    - CDMA data launched at YE 99
    - Single rate plans with large minute buckets

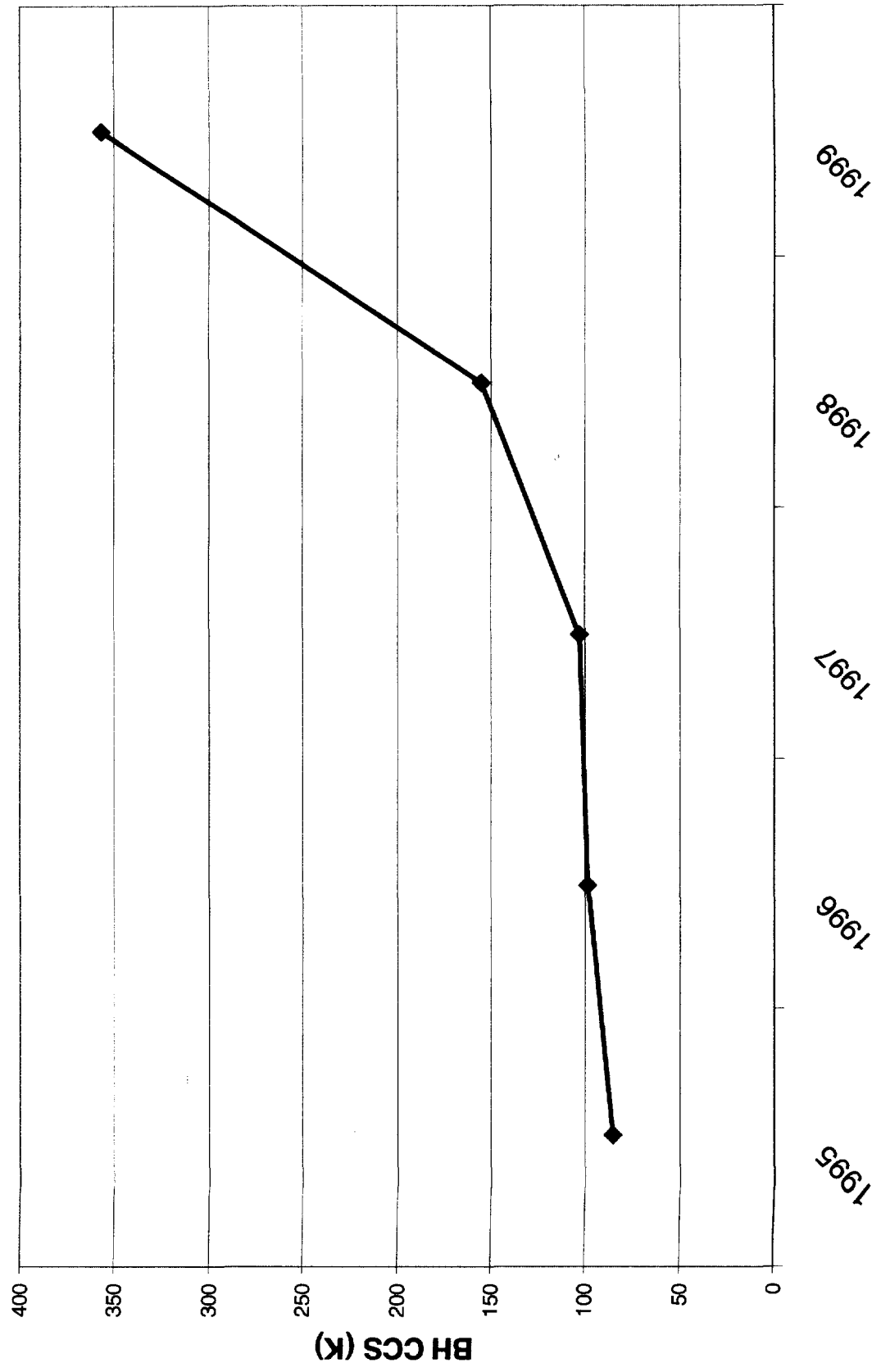
# NY Key Trends

- Trends Impacting Spectrum Requirements
  - Decreasing Per Minute Cost
  - Increasing Usage Per Subscriber
  - Increasing Subscribers
  - Increasing Busy Hour (BH) CCS
    - Decreasing Analog BH CCS
    - Increasing Digital BH CCS

# NY Bell Atlantic Mobile Subscriber Growth 1995-1999

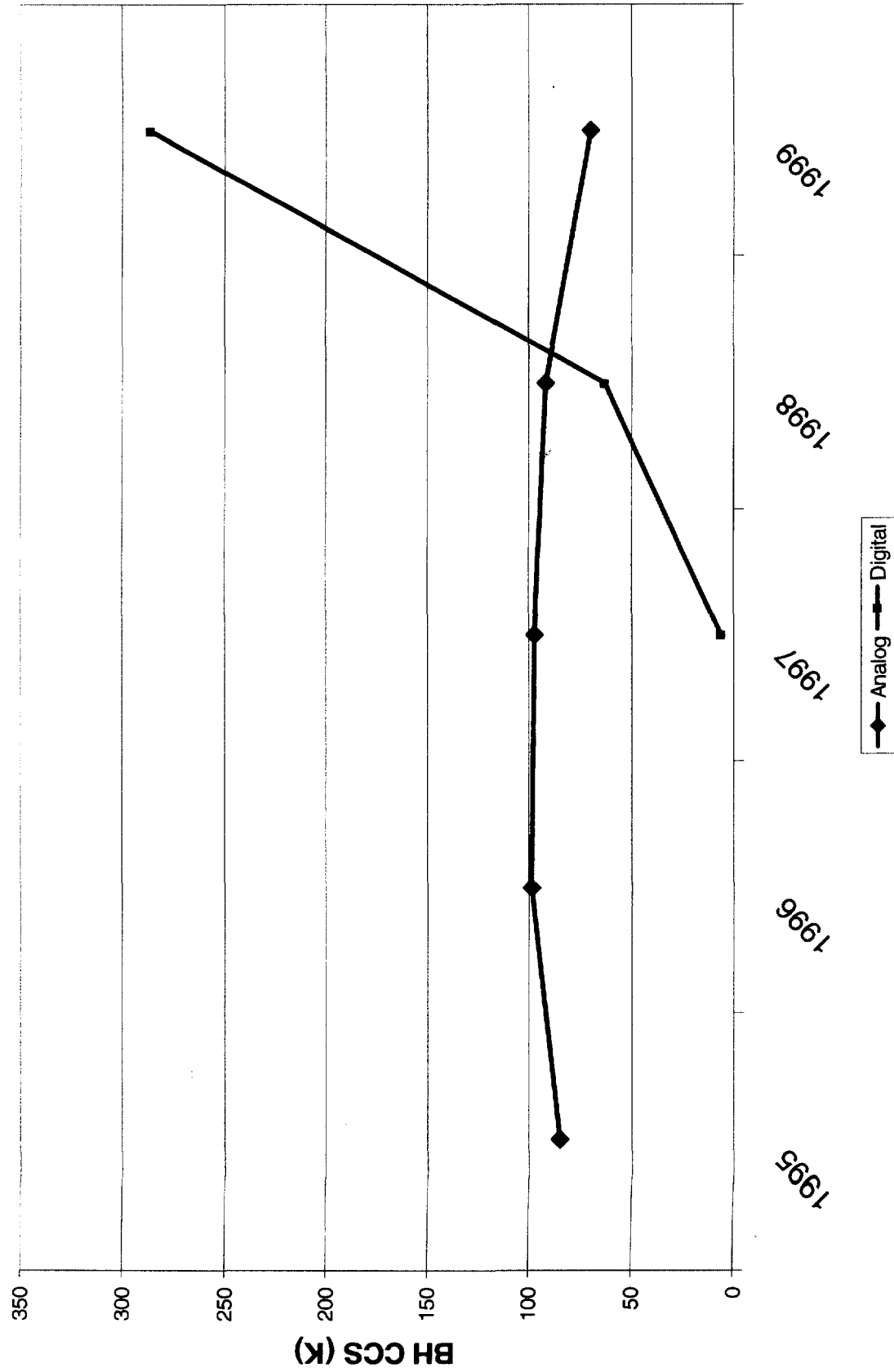


**NY Total Voice BH CCS  
1995-1999**





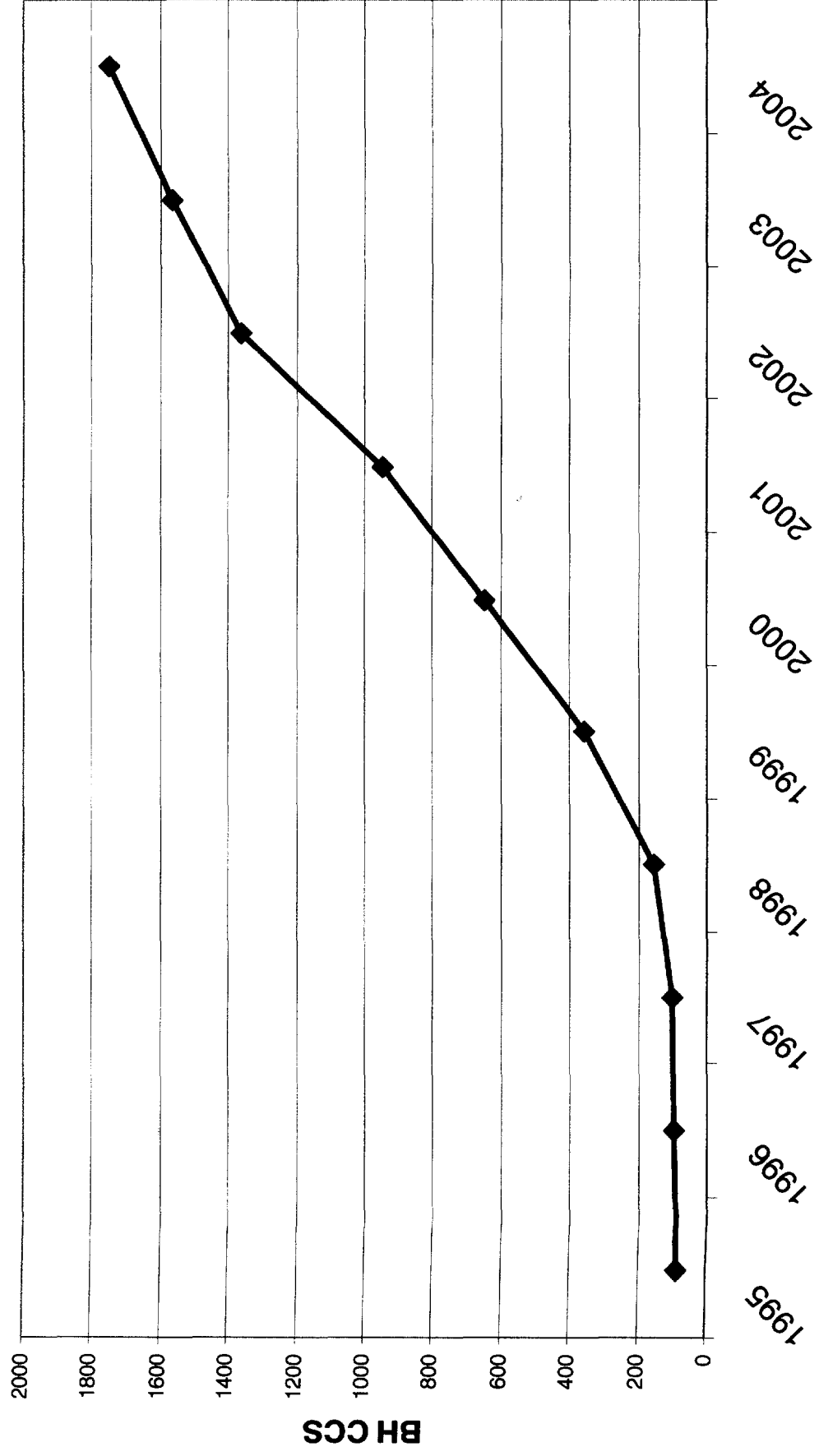
# NY Voice BH CCS Analog and Digital 1995-1999



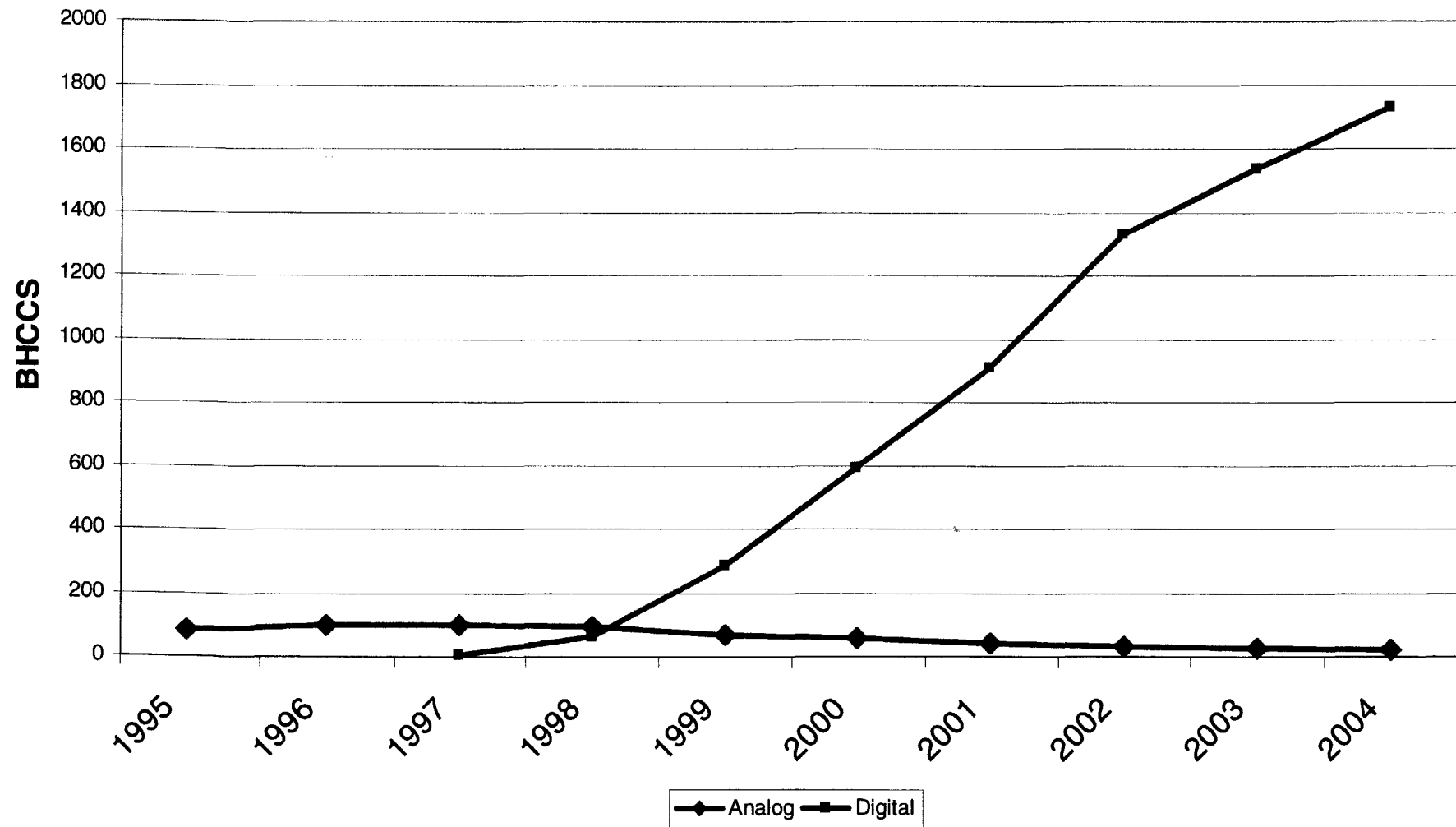
# Digital BH CCS Growth Drivers for 2000-2004

- Subscriber Growth
  - Analog to Digital Migration
- Voice Usage/Subscriber Growth
- CDMA Data Usage/Subscriber Growth
  - 14.4 kb/s service launched YE 99
  - 144 kb/s service targeted for 2001
  - 384 kb/s service targeted for 2002-2004

# NY Total BHCCS Projection 2000-2004



## NY BH CCS Analog and Digital Projection 2000-2004



# Conclusions

- In New York Over 35 MHz of Spectrum Is Required to Meet Demand for Existing Services
- Additional Spectrum Beyond 45MHz is Required for 3G
  - 700 MHz vs PCS
  - Lead time requirements